

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
	:	
v.	:	<b>DATE FILED:</b> _____
	:	
<b>DARRYL HUBBARD</b>	:	<b>VIOLATIONS:</b> 18 U.S.C. §924(a)(1)
	:	(false statement in acquisition of a firearm -
		15 counts)

**INFORMATION**

**COUNTS ONE THROUGH FIFTEEN**

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Collectors Firearms, Inc., 3301 Fondren, Suite O, Houston, Texas, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal law.
2. U.S. Heritage, located at 641 Route 309, Montgomeryville, in the Eastern District of Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal law.
3. Lou's of Upper Darby, 29 South 69<sup>th</sup> Street, Upper Darby, in the Eastern District of Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal law.
4. Fishtown Lock & Gun, 453 East Girard Avenue, Philadelphia, in the Eastern District of Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal law.
5. FFL holders were licensed, among other things, to sell firearms and

ammunition. Various rules and regulations promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which an FFL holder may sell firearms and ammunition.

6. The rules and regulations governing FFL holders required that a person seeking to purchase a handgun fill out a “Firearms Transaction Record,” ATF Form 4473. Part of the Form 4473 required that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The Form 4473 contained language warning that “[t]he federal firearms laws require that the individual filling out this form must be buying the firearm for himself or as a gift. Any individual who is not buying the firearm for himself/herself or as a gift, but who completes this form, violates the law.”

7. FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder.

8. On or about the dates specified below, in the Eastern District of Pennsylvania, defendant

**DARRYL HUBBARD**

in connection with the acquisition of each of the firearms listed below, from the FFL holders listed below, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holders’ records, in that defendant DARRYL HUBBARD certified on the Form 4473 that he was buying the firearms listed below for himself, and that his name was either “John Davis” or “Todd Jones,” when in fact, as defendant knew, these statements were false and fictitious:

COUNT	DATE	FFL	District	MODEL AND SERIAL NUMBER
1	7/24/01	Collectors Firearms	SDTX	SR .40 caliber pistol #341-09292
2	7/24/01	Collectors Firearms	SDTX	SR 9 mm pistol #314-30936
3	8/06/01	U.S. Heritage	EDPA	Glock G27 .40 pistol #EDG428US
4	8/06/01	U.S. Heritage	EDPA	Taurus PT140 .40 pistol #STC85840
5	8/06/01	U.S. Heritage	EDPA	Taurus PT111 9mm pistol #TTH51270
6	8/06/01	U.S. Heritage	EDPA	Taurus PT145, .45 pistol #NUF66657
7	8/08/01	Lou's of Upper Darby	EDPA	Smith&Wesson SW40V 9mm pistol #PBH1566
8	8/08/01	Lou's of Upper Darby	EDPA	Intratec AB10 9mm pistol #A056343
9	8/08/01	Fishtown Lock and Guns	EDPA	Tanfoglio Witness .40 pistol #EA13377
10	8/13/01	Lou's of Upper Darby	EDPA	Smith&Wesson SW40V .40 pistol #PAM3611
11	8/13/01	Lou's of Upper Darby	EDPA	Smith&Wesson SW40V .40 pistol #PAZ7444
12	8/14/01	U.S. Heritage	EDPA	Norinco MAK90, 7.62 #94-118148

13	8/14/01	U.S. Heritage	EDPA	Taurus PT140 .40 #STB 75421
14	8/14/01	U.S. Heritage	EDPA	Glock G30, .45 pistol #ECX314US
15	8/14/01	U.S. Heritage	EDPA	Taurus PT140 .40 #STF28486

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

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PATRICK L. MEEHAN  
UNITED STATES ATTORNEY